

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED

APR 29 2021

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

UNITED STATES OF AMERICA,	)	CASE NO.: 1:20CR392
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER, JR.
	)	
v.	)	
	)	
CHARLES VACCARO,	)	<u>MOTION TO SEAL INDICTMENT</u>
DROR SVORAI,	)	
DENNIS RUGGERI,	)	
KEVIN HAGEN,	)	
GARY BERLLY,	)	
YOSEF BITON,	)	
	)	
Defendants.	)	

Now comes the United States of America, by and through counsel, Brad J. Beeson, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reason(s): Flight risk.

The government further requests this Court to order that an Assistant United States Attorney of the Criminal Division of the United States Attorney's Office for the Northern District of Ohio may obtain, upon request, a certified copy of this indictment should the defendant be

located in another judicial district and a certified copy of this indictment is needed for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

VIPAL J. PATEL  
Acting United States Attorney  
Southern District of Ohio

By:



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Brad J. Beeson (IL: 6236690)  
Assistant United States Attorney  
United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113  
(216) 622-3850  
(216) 522-8355 (facsimile)  
Brad.Beeson@usdoj.gov